

## **EXHIBIT 1**

**Raymond Abro**  
**November 29, 2022**

1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

SHAMARA BOINES,

Plaintiff,

-vs-

Case No. 2:21-cv-13010-GCS-KGS

JARS HOLDINGS, LLC, d/b/a  
JARS CANNABIS and RAYMOND ABRO,  
jointly and severally,

Defendants.

\_\_\_\_\_/

The Deposition of RAYMOND ABRO,  
Taken at 423 N. Main Street,  
Suite 200, Royal Oak, Michigan,  
On Tuesday, November 29, 2022,  
Commencing at 9:43 a.m.  
Reported by: Pamela Mocerì, CSR-2285

**Raymond Abro**  
**November 29, 2022**

102

1 it's handed to the compliance officer to make sure the  
2 store is in compliance with the law, and at that point  
3 the store is supposed to be inspected by the  
4 compliance officer. This rule I know.

5 After that is handed to us, we then  
6 inspect the store and make sure it follows all  
7 guidelines for compliance. And if the inspector comes  
8 in because we weren't properly ready it is because the  
9 compliance officer did not review the store and follow  
10 all the compliance of the law whether it's required by  
11 the city or the state.

12 Q. Can you tell me what specific inspections were failed  
13 that caused you to or informed your reason for  
14 terminating Ms. Boines?

15 A. I didn't fail her simply because of inspections.

16 Q. You didn't fire her simply because of the inspections  
17 is what you're saying?

18 A. Correct.

19 Q. What inspections are you talking about now?

20 A. East Detroit, Owosso and Lansing all had to get second  
21 inspections or submit fixes that were noncompliant to  
22 the inspecting officers.

23 Q. Is that unusual that there is a needed fix when the  
24 inspectors come through?

25 A. It is unusual, yeah. Is there -- what's the word I'm

**Verbatim Court Reporters, P.C.****info@verbatimpc.com****(810) 772-1156**

**Raymond Abro**  
**November 29, 2022**

103

1 looking for? -- perception of rule with some  
2 inspectors, yes, and that's sometimes where we have to  
3 make a simple change because of an inspector's want  
4 rather than an actual law.

5 Q. If the issue with the inspections was the only issue  
6 with respect to Ms. Boines, would you have terminated  
7 her?

8 MR. SARCONI: Objection. Calls for  
9 speculation.

10 THE WITNESS: That is not the only reason  
11 why I fired her.

12 BY MS. BRAULT:

13 Q. I understand, but I'm asking if that was the only  
14 reason that existed, would you have fired her?

15 MS. BADALAMENTI: Calls for speculation.

16 THE WITNESS: I don't know how to answer  
17 that question.

18 BY MS. BRAULT:

19 Q. Well, the constant revisions, what were you talking  
20 about in terms of constant revisions?

21 A. With the SOPs that were written and policies and  
22 procedures that were written, there was constant miss  
23 in our initial conversation to when the SOP was  
24 written.

25 Q. Can you tell me of any specific SOP that you are

**Raymond Abro**  
**November 29, 2022**

130

1 Q. Did you get -- did you know between Shamara's  
2 departure and a month later that there was a posting?

3 A. No.

4 Q. So you just found out a month later that there was a  
5 posting?

6 A. Correct.

7 Q. Who ultimately filled that position of compliance  
8 officer when it was filled?

9 A. There was no position of compliance officer filled.

10 Q. Ever?

11 A. No.

12 Q. So you don't have the -- have a compliance officer in  
13 charge now?

14 A. Correct.

15 Q. Who performed that function once Shamara was --

16 A. It's a committee-based program.

17 Q. Have any JARS facilities -- have any facilities failed  
18 any inspections since Shamara left?

19 A. Yes.

20 Q. How many?

21 A. Don't know the answer.

22 Q. Do you think that -- so I'm going to ask you some  
23 questions about your beliefs.

24 Do you think that a family is better off  
25 if a woman stays at home rather than work outside the